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Attorneys for Defendant  
GOOGLE LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

CHASOM BROWN, MONIQUE TRUJILLO,  
WILLIAM BYATT, JEREMY DAVIS, and  
CHRISTOPHER CASTILLO, individually and  
on behalf of all similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**STIPULATION RE: ADMINISTRATIVE  
MOTION TO CONSIDER WHETHER CASES  
SHOULD BE RELATED**

The Honorable Yvonne Gonzalez Rogers

Pursuant to Civil Local Rules 3-12(a), 7-11, and 7-12, defendant Google LLC (“Google”) and individual Plaintiffs in the *Salcido* Action (collectively, the “Parties”), by and through their attorneys of record, hereby stipulate and agree as follows:

WHEREAS, the above-captioned action, *Brown, et al. v. Google LLC*, Case No. 20-cv-03664-YGR-SVK (N.D. Cal.) (the “*Brown* Action”), was filed in this District on June 2, 2020 and is currently pending before the Honorable Yvonne Gonzalez Rogers;

WHEREAS, *Salcido, et al. v. Google LLC*, Case No. 5:24-cv-06462 (N.D. Cal.) (the “*Salcido* Action”) was removed to this District from the Superior Court of the State of California, County of Santa Clara on September 13, 2024 and is currently pending before Magistrate Judge Nathanael M. Cousins;

WHEREAS, Google filed an Administrative Motion to Consider Whether Cases Should be Related on September 18, 2024;

WHEREAS, the *Salcido* Action advances substantially the same allegations and claims and names the same defendant at issue in *Brown*, and includes the same plaintiffs as those within the scope of the nationwide classes certified in the *Brown* Action;

WHEREAS, there will be an unduly burdensome duplication of labor and expense or conflicting results if the *Salcido* Action and the *Brown* Action are conducted before different Judges;

WHEREAS, the Parties agree that the *Salcido* Action is related to the *Brown* Action and should proceed before the Honorable Yvonne Gonzalez Rogers;

NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the Parties that the *Salcido* Action and the *Brown* Action are related cases pursuant to Local Rule 3-12(a).

**IT IS SO STIPULATED.**

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1 Dated: September 18, 2024

COOLEY LLP

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3 By: /s/ Aarti Reddy  
4 Aarti Reddy

5 Attorney for Defendant  
6 GOOGLE LLC

7 Dated: September 18, 2024

POTTER HANDY LLP

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9 By: /s/ Mark Potter  
10 Mark Potter

11 Attorney for Plaintiffs  
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**FILER'S ATTESTATION**

Pursuant to Local Rule 5-1(i)(3) of the Northern District of California, I, Aarti Reddy, hereby certify that the content of this document is acceptable to Mark Potter, and that I have obtained his authorization to affix his electronic signatures to this document. Executed on September 18, 2024, in San Francisco, California.

/s/ Aarti Reddy  
Aarti Reddy